

March 14, 2014

Michelle Lee
Deputy Under Secretary of Commerce for Intellectual Property
and Deputy Director of the U.S. Patent and Trademark Office
600 Dulany Street
Alexandria, VA 22314

Re: Coalition for Patent and Trademark Information Dissemination Response to USPTO
Request for Public Comments Regarding Prior Art Resources for Use in the
Examination of Software-Related Patent Applications

Dear Deputy Under Secretary Lee:

The Coalition for Patent and Trademark Information Dissemination (CPTID) is a group of private sector companies that provide value-added services for patent and trademark information users, including USPTO examiners. These companies have been investing in and building efficient, high quality patent and trademark research services for more than 50 years. For patent research purposes, their services cover U.S. and foreign patents, pre-grant publications, and non-patent literature; and for trademark searches, U.S. pending and registered marks, as well as state, common law, and foreign marks.

We believe that a well-functioning U.S. Patent and Trademark Office (“USPTO”) promotes innovation and job creation and strengthens the U.S. economy. Those who innovate and create patented and trademarked works in this country rely on an efficient USPTO for their financial success and ability to continue innovating. On behalf of our members, we appreciate the opportunity to provide this written submission commenting on the following questions: 1. What specific databases, Web sites, tools and other resources do you find useful in searching for software-related inventions? Please indicate strengths and limitations of each resource. 2. What are your concerns regarding the manner in which USPTO examiners formulate and implement search strategies to identify prior art for software related inventions? How should these concerns be addressed?

Some of the Coalition’s members may be making their own separate filings in response to the USPTO’s Request for Comments. We submit these comments as a Coalition, however, to highlight as a group the important role that private sector publishers play in helping the USPTO strengthen its capacity to identify prior art for software related invention, thus improving the quality of its software related patents.

Coalition for Patent and Trademark Information Dissemination
Corsearch * Dialog * Reed Elsevier * Thomson Reuters

I. Background

Private Sector Publishers are an Important Part of the Patent Landscape

Issuance of high quality patents and a well-functioning patent legal landscape is dependent on clear and accessible information about what patents actually exist and what other prior art is available. This information is generally provided by commercial publishers, including members of the Coalition, who process raw data coming from the patent and trademark offices and other sources and make it searchable, thus more usable, by patent and trademark searchers, innovators, attorneys, and enforcers.

Commercial providers are an indispensable part of the classic value creation chain for patent information. The first link involves patent offices, which collect basic information from applicants and make it available to the public and commercial service providers. Few in the general public can make optimal use of the raw data that comes out of the offices, and thus it is the second link - the commercial providers - who process the raw data and add value through additional data, features and functionality, improving its searchability and usefulness, to users. The U.S. patent system thus depends on the dissemination of value-added information. Such dissemination can best be achieved by a private-public partnership that takes advantage of the core strengths of the patent offices as well as the private sector publishers. A competitive private sector patent information industry complemented by the USPTO provides the optimal approach for meeting the broad range of user needs – from specialists to the general public – and is just the type of dynamic private public partnership necessary for our nation to lead and thrive in the 21st century.

USPTO Policies Should Encourage a Diversity of Sources for Patent Information

U.S. law embraces the notion that that one should not rely on a single source of information, and that the best and most accurate information is best derived from a marketplace of ideas with a multiplicity of sources. Thus, Federal statute provides that Federal government agencies shall ensure public access to an agency's public information by "encouraging a diversity of public and private sources for information based on government public information." (44 USC 3506(d)(1)(A)). The statute's enforcement vehicle, OMB Circular A-130, provides that in determining how and whether to disseminate information, agencies will: "[t]ake advantage of all dissemination channels, Federal and nonfederal, including State governments, libraries, and private sector entities, in discharging agency information dissemination activities."

The concept of "a diversity of sources" has special applicability to patent information, including prior art searching for software related inventions. Each area of technology benefits from different types of search tools to achieve optimal results for understanding what patents already exist and what prior art is out there. There are many types of uses of patent information, and there are many types of users in addition to those who conduct searches for patentability, infringement, validity, etc. If there is only one source or only few sources, this diversity and its benefits can be lost.

The USPTO Should Recognize That Functionality Is Value, and Functionality Costs

Added functionality--added value--is really at the heart of what private sector patent information services do. It is the second link in the process of dissemination of patent and trademark data, and it represents the results of their investment in both dollar and human capital in a given year. It is a never-ending process. Adding value can add considerable costs to a patent office's budget, and since applicants and grantees are paying for patent offices, added value can translate into added costs to inventors.

Here is where a solid private-public partnership can provide optimal results for meeting the broad range of user needs. For example, when the USPTO conducted analyses of full-text searching and its costs several years ago, it was generally agreed that the private sector plays an important role in addressing USPTO objectives. Moreover, there was a strong positive correlation between high costs to the USPTO and functions that Coalition member companies provide. As such, the USPTO was sensitive to the negative impact aggressive and expensive enhancements of their public search systems would have on vendors. Considering that the USPTO is funded by users of the agency, decisions on appropriate functionality can sometimes be made based on costs alone.

The USPTO's Policies Should Create an Environment for Maximizing Competition among Private Sector Patent Information Providers

Maximizing competition requires creating, not destroying, incentives for investment. No rational investor will risk capital where the plans of a patent office is not known, or where there is not reasonable certainty that fair and open competition will prevail. This means open competition among private sector companies in the marketplace and fair competition with a patent or trademark office or its proxy. Fairness implies that a patent office is not overreaching in the added value it is providing free. If a patent office takes steps to directly compete with private sector companies, a market distortion is created and this can lead to destruction of the marketplace. Fairness also means maintaining a practice of opening all work with outside parties – paid or not paid – to an open and transparent contracting process.

II. What specific databases, Web sites, tools and other resources do you find useful in searching for software-related inventions? Please indicate strengths and limitations of each resource.

Many of USPTO's groups have access to tens of thousands of resources from our Coalition members. For example, Scientific and Technical Information Center (STIC) staff and patent examiners already have access to ProQuest and Reed Elsevier resources that are useful in researching software patents, and the Westlaw and Thomson Innovation Platforms from Thomson Reuters provide support for a number of divisions' individual missions and goals including STIC, Office of General Counsel (OGC), Trademark Trial and Appeal Board (TTAB), Board of Patent Appeals and Interferences (BPAI), as well as EED. See Attachment 2 for the specific Reed Elsevier resources currently available to the USPTO and the number of publications or databases they contain. See Attachment 3 for a selected list of Thomson Reuters resources relevant to software invention searching. Attachments 4-7 provide additional lists of additional resources.

The strengths of these resources are plentiful with brands that are industry leaders. The depth and breadth of coverage that these resources provide are the best of brand, and customer support for these resources is timely and thorough.

Coalition members provide a wide array of time-saving and efficiency-driving services to assist patent examiners and STIC staff. USPTO staff download millions of documents from Coalition members each year. Coalition member databases provide access to high-quality content, with broad and deep coverage of non-patent literature such as foreign patents and peer-reviewed, technical, and industry and trade journals.

ProQuest Dialog, Reed Elsevier and Thomson Reuters deliver patent offerings in the marketplace with full-text and bibliographic patent authorities. These offerings include PDFs, claims, specifications, forward and backward citations, families, and legal status tables.

Coalition members' products contain millions of NPL documents and global patents in software related research topics.

The ProQuest ebook platform, Ebrary, provides access to over 100,000 e-book titles and their Serials Solutions tools help USPTO staff access full-text articles as available from within STIC's e-journal collections; this service not only meets on-demand needs for full-text materials, but further increases the STIC collection ROI.

In addition to its commercial services, ProQuest has assisted the USPTO in creating E2D2, a private database built for and with STIC and examiners, provides access to examiner-submitted "best practice" materials including NPL and patents from across technology centers. Beyond these information services, ProQuest also provides support and customized training to help examiners and STIC staff to increase search competencies and effectiveness.

Given the global diversity and changing environment, the products and services of the Coalition members provide the foundational research to USPTO that fosters the integrity of patent, trademarks and intellectual property and encourages investment and fosters the innovative spirit.

III. What are your concerns regarding the manner in which USPTO examiners formulate and implement search strategies to identify prior art for software related inventions? How should these concerns be addressed?

The USPTO has noted that it provides examiners access to Non-Patent Literature (NPL) through multiple electronic resources purchased from various publishers. STIC currently subscribes to 59,000 electronic journals and over 145,000 electronic books in full text.

There are three particular resources that do not appear to be available to STIC that would likely be quite useful, especially for prior art searching for software related inventions:

1) Patent Law Emerging Issues: This is a database of commentaries covering the most important and rapidly emerging issues in patent law today. This collection of articles provides expert guidance written by attorneys practicing in the field. The commentaries examine a wide range of recent cases,

regulations, trends, and developments. These accounts cover national, state and international issues and provide expert insight in important areas and legal developments.

2) IP Law & Strategy Series: The LexisNexis IP Law & Strategy Series offers the expertise and guidance of practitioner authors from AmLaw 100 firms, Fortune 500 companies and U.S. government agencies. This collection of 40+ titles acquired from Oxford University Press, U.S. Law Division, includes checklists, practice pointers and forms.

3) Thomson Reuters WestLaw business is also a provider of best practices texts (non-patent literature) with the WestLaw Analytical Library print resources. A selected list of these resources valid to software invention searching are included in Attachment 4.

The Coalition suggests that all of the above resources should be considered for use by the USPTO for improving prior art searching.

IV. Closing

In closing, we want to reiterate the Coalition's appreciation for the USPTO's efforts to solicit and consider stakeholder input on what specific databases, Web sites, tools and other resources our members find useful in searching for software-related inventions; our concerns regarding the manner in which USPTO examiners formulate and implement search strategies to identify prior art for software related inventions; and how these concerns should be addressed. We thank you for this opportunity to emphasize that private sector publishers are a significant part of the patent landscape, including for software related patents. The U.S. patent system depends on the dissemination of value-added information. Such dissemination can best be achieved by a public-private partnership that takes advantage of the core strengths of the patent offices as well as the private sector publishers. A competitive private sector patent information industry complemented by the USPTO provides the optimal approach for meeting the broad range of user needs, including for prior art searching for software related inventions.

Sincerely,

Marla Grossman
Executive Director
Coalition for Patent and Trademark Information Dissemination

See Attachment 1 for Background on Coalition Members

Attachment 1: Background on Members of the Coalition for Patent and Trademark Information Dissemination

Corsearch:

- *Corsearch is the result of the merger over 10 years ago of Trademark Research Company (TRC) and Corsearch, Inc. TRC had been formed as the “Trademark Service Corporation” in 1949, and had set the stand in superior data and organization of its intellectual property reports. Corsearch Inc. was formed in 1983, initially focusing on litigation support services, but then concentrating on intellectual property research since 1985. Corsearch has been a leader in innovation when it offered the first comprehensive computerized search in the industry. Corsearch is part of Wolters Kluwer Corporate Legal Services (CLS), a business of Wolters Kluwer, a market-leading global information services company with more than 19,000 employees worldwide.*

ProQuest:

- *ProQuest provides the USPTO with a wide array of content and services to assist examiners and STIC staff. ProQuest Dialog leads the industry with the largest collection of prior art available in a single, integrated resource – optimizing patent and non-patent literature research with scientific, technical, and medical databases, full-text dissertations, global news, and trade press. Ebrary provides access to over 100,000 e-book titles. Serials Solutions tools help USPTO staff access full-text articles as available from within STIC’s e-journal collections. In addition to our commercial services, ProQuest has assisted USPTO in creating E2D2, a private database built for and with STIC and examiners. ProQuest also provides support and customized training to increase search competencies and effectiveness. ProQuest is headquartered in Ann Arbor, Michigan and has more than 1,800 employees worldwide.*

Reed Elsevier:

- *Reed Elsevier’s company, LexisNexis, provides the world’s most respected intellectual property treaties: Matthew Bender’s Chisum on Patents, Nimmer on Copyright, and Gilson on Trademarks. LexisNexis also offers a complete collection of federal and state caselaw, statutes, court dockets and filings; a searchable collection of more than 3.8 billion public records, including information on personal assets and business records; and an extensive collection of business news publications. In recent years, LexisNexis added over 1,600 full-text Elsevier Journals in science, medicine and technology; and coverage of IP practice and legislation for over 230 countries from Global IP Law Service.*

Thomson Reuters:

- *Spanning the innovation lifecycle from discovery to development to delivery, [Thomson Reuters Intellectual Property & Science](#) provides category leading content and tools, including the Derwent World Patent Index, Delphion, Aureka, Thomson Innovation, Thomson CompuMark and Serion, and Web of Knowledge. Derwent – a member of the Thomson Reuters family – traces its first U.S. Patent and Trademark Office: Fee Schedule Adjustment and Agency Reform value-added patent service to 1948. Thomson Reuters is headquartered in New York City. It has 60,000 employees in more than 100 countries and operates eight offices in the United States.*

Attachment 2 Reed Elsevier Resources Useful in Searching for Software-related Inventions

<u>Reed Elsevier Resource</u>	<u>Number of Publications or Databases</u>
Elsevier - Science Direct Electronic Journals	1,682
Elsevier E-Books (Referex)	2,270
TotalPatent Global Patent Authorities	100
Matthew Bender Electronic Books	7
U.S. State and Federal Case Law	3,051
U.S. Legislation, Statutes & Codes	6,453
Constitutions	16
Administrative Materials & Regulations	1, 208
Boards, Panels & Tribunals	32
Treaties & International Agreements	13
Court Materials & Jury Instructions	201
Treatises & Analytical Material	4,431
Forms	69
Dictionaries	14
Legal Indexes & Tables	26
Law Directories	145
Law Reviews & Journals	1,087
Legal News	598
General News	8,657
Copyright, Trademark and Patent Filings	147
Companies & Organizations	564
Industries & Markets	118
U.S. Public Records	12
People Directories & Profiles	126
Country & Region Reports	312
Scientific Materials	16
Reference	17
Professional & Educational Materials	218

Attachment 3: Thomson Reuters Resources Useful in Searching for Software-related Inventions

<u>Database Title</u>	<u>Platform</u>
Derwent World Patents Index	Thomson Innovation
INPADOC.db	Thomson Innovation
Web of Science	Thomson Innovation
Current Contents Connect	Thomson Innovation
Conference Proceedings	Thomson Innovation
Inspec	Thomson Innovation
WestLaw NewsRoom	Thomson Innovation
European (EP) Searchable Full Text	Thomson Innovation
France (FR) Searchable Full Text	Thomson Innovation
Germany (DE) Searchable Full Text	Thomson Innovation
Japan (JP) Searchable Full Text	Thomson Innovation
Japan (JP) Searchable Full Text	Thomson Innovation
PCT (WO) Searchable Full Text	Thomson Innovation
UK (GB) Searchable Full Text	Thomson Innovation
United States (US) Searchable Full Text	Thomson Innovation
China (CN) Searchable Full Text	Thomson Innovation
Indian Searchable Full Text	Thomson Innovation
Indonesian Searchable Full Text Patents	Thomson Innovation
Korean Searchable Full Text Patents	Thomson Innovation
Malaysian Searchable Full Text Patents	Thomson Innovation
Singapore Searchable Full Text Patents	Thomson Innovation

Thai Searchable Full Text Patents	Thomson Innovation
Vietnamese Searchable Full Text Patents	Thomson Innovation
All News	West Law
ALR Index	West Law
ALR International	West Law
American Journal of International Law	West Law
American Jurisprudence 2d	West Law
American Jurisprudence Legal Forms 2d	West Law
American Law Reports	West Law
Bogert's Trusts and Trustees	West Law
Callmann on Unfair Competition, Trademarks and Monopolies	West Law
Causes of Action	West Law
CCH Computer and Internet News Alert	West Law
Corporate Compliance Series: Intellectual Property	West Law
Customs Enforcement of Intellectual Property Rights	West Law
Eckstrom's Licensing in Foreign and Domestic Operations	West Law
Eckstrom's Licensing in Foreign and Domestic Operations: Joint Ventures	West Law
Federal Procedural Forms	West Law
Federal Procedure	West Law
Fletcher Forum of World Affairs	West Law
Foreign Corrupt Practices Act - News	West Law
Guide to European Patents	West Law
Intellectual Property Due Diligence in Corporate Transactions	West Law

International Journal of Not-for-Profit Law	West Law
International Law - Law Reviews, Texts & Bar Journals	West Law
International Professional Directory	West Law
IP Strategy: Complete Intellectual Property Planning, Access & Protection	West Law
Japanese Patent Litigation	West Law
Law of Merchandise and Character Licensing, The	West Law
Modern Patent Law Precedent	West Law
Nichols Cyclopedia of Legal Forms Annotated	West Law
Patent Applications Handbook	West Law
Patent Law Fundamentals	West Law
Patent Practice & Policy in the Pacific Rim	West Law
Patents Throughout the World	West Law
Restatement of the Law - The Foreign Relations Law of the United States	West Law
Stimulus Plan News	West Law
Trademark Practice and Forms	West Law
Trademark Practice Throughout the World	West Law
US Securities Law for International Financial Transactions and Capital Markets, Second Edition	West Law
West's Federal Forms	West Law
West's Legal Forms	West Law
World Intellectual Property Rights and Remedies	West Law

Attachment 4: Thomson Reuters WestLaw business and WestLaw Analytical Library Resources

Annotated Patent Digest

Assets & Finance: Audits and Valuation of Intellectual Property

Assets & Finance: Intellectual Property in Mergers and Acquisitions

Assets and Finance: Insurance Coverage for Intellectual Property and Cyber Claims

Calculating Intellectual Property Damages

Code of Federal Regulations Annotated Title 37, Patents, Trademarks and Copyrights

Computer and Information Law Digest, 2d

Computer Software Agreements: Forms and Commentary with Forms on CD-ROM

Computer Software Protection/ Liability/ Law/Forms

Corporate Counsel's Guide to Licensing

Corporate Counsel's Guide to Privacy

Corporate Counsel's Guide to Technology Management and Transactions

Corporate Counsel's Guide to Technology Management and Transactions

Corporate Counsel's Guide to Trademark Law

CyberSpace Lawyer

Designs and Utility Models Throughout the World

Eckstrom's Licensing in Foreign and Domestic Operations

Eckstrom's Licensing in Foreign and Domestic Operations: Joint Ventures

Eckstrom's Licensing in Foreign and Domestic Operations: The Forms and Substance of Licensing

Federal Circuit Patent Case Digests

Federal Intellectual Property Laws and Regulations

Federal Unfair Competition: Lanham Act § 43A

Forms & Agreements on Intellectual Property & International Licensing

Franchise and Distribution Law and Practice

Information Law

Intellectual Property Counselor

Intellectual Property Due Diligence in Corporate Transactions: Investment, Risk Assessment and Management

Intellectual Property in Commerce

Intellectual Property Law for Business Lawyers

Intellectual Property Law Review

Intellectual Property Litigation Guide: Patents and Trade Secrets

Intellectual Property Litigation Reporter (Andrews Litigation Reporter)

Intellectual Property Litigation News (Rutter Group Newsletter)

Inter Partes Reexamination 2d

Internet Law and Practice

IP Strategy: Complete Intellectual Property Planning, Access & Protection

Japanese Patent Litigation

Law and Business of Computer Software, 2d

Licensing and the Art of Technology Management

Manual of Patent Examining Procedure, 8th, Rev. 7

Modern Patent Law Precedent: Dictionary of Key Terms and Concepts, 9th

Moy's Walker on Patents, 4th

Multimedia and Technology Licensing Agreements

Nanotechnology Law

Patent Application Practice, 2d

Patent Applications Handbook

Patent Claims, 3d

Patent Damages Law and Practice

Patent Law Handbook (Intellectual Property Library)

Patent Law Practice Forms

Patent Law Review

Patent Law: Legal & Economic Principles, 2d

Patent Office Litigation

Pattern Discovery: Products Liability, 3d

Pre-Litigation Patent Enforcement

Protecting Intellectual Property Rights Across Borders

State Computer Law: Commentary, Cases & Statutes

The Law of Computer Technology - Rights - Licenses - Liabilities

TRADING ARRANGEMENTS IN PACIFIC RIM ASEAN & APEC

Attachment 5: LexisNexis IP Law & Strategy Series

Global IP Law Service for Patents, Trademarks, Utility Models and Domain Names

Associate's Guide to the Practice of Copyright Law

Biotechnology & Nanotechnology Regulation

Business Method & Software Patents

Canadian Intellectual Property Law and Strategy

Clean Tech Intellectual Property

Corporate Insider's Guide to U.S. Patent Practice

Criminal Enforcement of Intellectual Property Rights: U.S. Perspective

Entertainment Litigation

Essentials of Patent Claim Drafting

False Advertising and the Lanham Act

Gray Markets: Prevention, Detection and Litigation

Intellectual Property Culture and Compliance, 2d Edition

Intellectual Property in Eastern Europe & Commonwealth of Independent States

Intellectual Property in Government Contracts, 2d Edition

Internet Crimes, Torts and Scams: Investigation and Remedies, Second Edition

IP Strategy, Valuation, and Damages

License, Royalty & Revenue Agreements: Drafting, Monitoring and Auditing

Music and Copyright

Patent Appeals: The Elements of Effective Advocacy in the Federal Circuit

Patent Application Drafting

Patent Ethics: Litigation

Patent Ethics: Prosecution

Patent Related Misconduct Issues in U.S. Litigation

Rules of Patent Drafting

Software Licensing

Technology Licensing and Development Agreements

The Business of Intellectual Property

Thesaurus of Patent Claim Construction

Trade Dress: Evolution, Strategy and Practice

Trade Secret Law and Corporate Strategy

Trade Secrets: Law and Practice

Trademark & Copyright Litigation

Trademark Surveys: A Litigator's Guide

U.S. Patent Opinions & Evaluations, 2d Edition

U.S. Patent Prosecutors Desk Reference

Winning the Patent Damages Case

Attachment 6: LexisNexis Matthew Bender All Intellectual Property Law

Baxter World Patent Law - Index

Business Law Monographs: Intellectual Property

California Intellectual Property Handbook

Chisum on Patents

Chisum on Patents - Index

Computer Law: A Guide to Cyberlaw and Data Privacy Law

Corporate Counsel Solutions: IP Mgm't: Strategies & Tactics

Corporate Counsel Solutions: IP Mgm't: Strategies & Tactics - Index

Court of Appeals for the Federal Circuit Practice & Procedure

Current Legal Forms for Intellectual Property

Entertainment Industry Contracts

European Patent Law and Practice

Gilson on Trademarks

Gilson on Trademarks - Index

Horwitz on Patent Litigation

Intellectual Property Counseling and Litigation

International Computer Law

International Copyright Law and Practice

Manual of Patent Examining Procedure

Matthew Bender Publications, Combined (G)-37 Sources

McGrady on Domain Names

McGrady on Social Media

Milgrim on Licensing

Milgrim on Licensing - Index

Milgrim on Trade Secrets

Milgrim on Trade Secrets - Index

New York Intellectual Property Law

Nimmer on Copyright

Nimmer on Copyright - Index

NY Matthew Bender® Publications, Combined (G)-1 Sources

Patent Case Management Judicial Guide

Patent Law Digest

Patent Law Perspectives

Patent Licensing Transactions

Patent Office Rules and Practice

Patent Office Rules and Practice - Index

Section 337 Patent Investigation Management Guide

Taxation of Intellectual Property and Technology

Trademark Manual of Examining Procedure

Trademark and Unfair Competition Deskbook

World Trademark Law and Practice

Matthew Bender Key Forms & Agreements (22 Sources)

Attachment 7: Reed Elsevier's TotalPatent
Full Text Authorities

Austria	Great Britain
Australia	Ireland
Belgium	India
Brazil	Italy
Canada	Japan-abstract only
Switzerland	Republic of Korea (South Korea)
China	Luxembourg
The former German Democratic Republic (East Germany)	Monaco
Germany	Mexico
Denmark	Netherlands
Eurasia, including Armenia, Azerbaijan, Belarus, Kazakhstan, Kyrgyzstan, Moldova, Russian Federation, Tajikistan, Turkmenistan, Uzbekistan	Portugal
European Patent Office	Russian Federation
Spain	Sweden
Finland	USSR
France	Taiwan, Republic of China (R.O.C.)
	United States
	World Intellectual Property Organization (WIPO)

Bibliographic Authorities

ARIPO (African Regional Industrial Property Organization). Includes Botswana, Gambia, Ghana, Kenya, Lesotho, Malawi, Mozambique, Namibia, Sierra Leone, Sudan, Swaziland, Tanzania, Uganda, Zambia, Zimbabwe.	Algeria
Argentina	Ecuador
Bosnia and Herzegovina	Estonia
Bulgaria	Egypt
Brunei Darussalam	Patent Office of the Cooperation Council for the Arab States of the Gulf (GCC)
Bolivia	Greece
Belarus	Guatemala
Chile	Hong Kong
Colombia	Honduras
Costa Rica	Croatia
Czechoslovakia	Hungary
Cuba	Indonesia
Cyprus	Israel
Czech Republic	Iceland
Dominican Republic	Kenya
	Kazakhstan
	Lebanon
	Lithuania
	Latvia
	Morocco

Republic of Moldova
Mongolia
Malta
Malawi
Malaysia
Nicaragua
Norway
New Zealand
African Organization of Intellectual
Property (African Organization of
Intellectual Property) including Benin,
Cameroon, Central African Republic,
Chad, Congo, Equatorial Guinea, Gabon,
Guinea, Guinea-Bissau, Ivory Coast,
Mali, Mauritania, Niger, Senegal, Togo
Panama
Peru
Philippines
Poland
Paraguay
Romania
Singapore
Slovenia
Slovakia
San Marino
El Salvador
Thailand
Tajikistan
Turkey
Trinidad and Tobago
Ukraine
Uruguay
Uzbekistan
Venezuela
Vietnam
Yugoslavia
South Africa
Zambia
Zimbabwe